

Charles Michael  
212 378 7604  
cmichael@steptoe.com

1114 Avenue of the Americas  
New York, NY 10036  
212 506 3900 main  
www.steptoe.com

Steptoe

Granted. The briefing schedule and page limits proposed herein are adopted.

So ordered.

Dated: March 25, 2024

March 22, 2024

**By ECF**

Hon. J. Paul Oetken  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007



J. PAUL OETKEN  
United States District Judge

**Re: *People of the State of New York v. Citibank N.A., 24 Civ. 0659 — Request by Consent to Extend Deadlines and Enlarge Page Limits for Motion to Dismiss***

Dear Judge Oetken:

Our firm represents defendant Citibank N.A. (“Citibank”) in the above case, and we write under Rule 3.C of Your Honor’s Individual Practices, to jointly request, along with Plaintiff, the New York Attorney General (“NYAG”), that Citibank’s forthcoming motion to dismiss, due April 2, 2024, be briefed on the following schedule and with the following enlarged page limits:

Filing	Deadline	Page Limit
Motion to Dismiss	April 2, 2024	45
Opposition	May 17, 2024	45
Reply	June 18, 2024	30

We make this request because of the number and novelty of the issues in the case and because of their complexity and importance.

In brief, NYAG’s Complaint challenges Citibank’s processes for addressing the problem of scammers infiltrating consumers’ online bank accounts to wire out money, including the legal framework Citibank uses to determine whether consumers should be reimbursed. The Complaint is 71 pages long and contains eight causes of action, based on alleged violations of various federal and state laws and regulations, several of which have been the subject of little if any litigation previously.

Hon. J. Paul Oetken  
March 22, 2024  
Page 2

Steptoe

The parties agree that the issues justify an enlargement of the standard timetable and page limits, and respectfully request the Court “So Order” the negotiated terms reflected in this letter.

Respectfully,



Charles Michael

cc: All Counsel of Record (via ECF)